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VIA ECF AND FEDEX

Hon. Ann Donnelly, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Juan Carlos Torres Ibarra, et al. v. W & L Group Construction Inc., et al.

Case No. 1:19-cv-01582-AMD-SMG (E.D.N.Y.)

Dear Judge Donnelly:

This firm represents Defendant W & L Group Construction Inc. ("W & L Group") in the above-referenced matter. Per Your Honor's Individual Rules 1.D and 4.E and in connection with W & L Group's Motion to Dismiss the Complaint under FRCP 12(b)(6), enclosed please find a binder containing the courtesy copies of:

- (1) Notice of Motion to Dismiss (Dkt. 16);
- (2) Memorandum of Law in Support of Defendant W & L Group Construction Inc.'s Motion to Dismiss the Complaint (Dkt. 17);
- (3) Memorandum of Law in Opposition to Defendant's Motion to Dismiss (Dkt. 19); and
- (4) Reply Memorandum of Law in Support of Defendant W & L Group Construction Inc.'s Motion to Dismiss the Complaint (Dkt. 20).

Sincerely,

/s/ Kevin K. Yam

Kevin K. Yam

Cc: Magistrate Judge Steven M. Gold (via ECF)
David A. Feinerman (via ECF)